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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MIESHIA MARIE JACKSON, an
individual on behalf of herself, the
State of California, as a private
attorney general, and on behalf of all
others similarly situated,

Plaintiff,

v.

FASTENAL COMPANY, a
Minnesota Corporation; and DOES 1
TO 20,

Defendants.

CASE NO.: 1:20-cv-000345-NONE-
SAB

**DECLARATION OF LAURA SINGH
(ON BEHALF OF CPT GROUP,
INC.) WITH RESPECT TO
DISBURSEMENT AND FINAL
ACCOUNTING**

Date: October 13, 2022

Time: 11:00 a.m.

Judge: Hon. Stanley A. Boone

Dept.: Courtroom 9

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10 Attorneys for Defendant

11 Fastenal Company

I, Laura Singh, declare as follows:

1. I am employed by CPT Group, Inc., the Court-approved class action Settlement Administrator for *Mieshia Marie Jackson v. Fastenal Company*, as a Case Manager. I have personal knowledge of the facts set forth in this Declaration, and if called as a witness, I could and would testify competently thereto.

2. Settlement Administrator (“CPT”) has extensive experience in providing notice of class actions and administering class action settlements. In the past 30 years, we have provided notification and/or claims administration services in over one thousand class action cases.

3. CPT was selected by the parties to administer the settlement in this action. In this capacity, CPT was charged with (a) printing and mailing to Class Members the *Notice of Proposed Class Action Settlement* and *Class Action Settlement Share Form*, in both English and Spanish (hereinafter collectively referred to as “Notice Packet”); (b) processing undeliverable mail and locating updated addresses for Class Members; (c) receiving other communications about the settlement; (d) notifying the parties of the number of Class Members who filed timely requests for exclusion; (e) notifying the parties of the number of Class Members who filed untimely or deficient requests for exclusion, and taking steps to cure the deficiencies; (f) establishing and maintaining a toll free case hotline where Class Members can speak to case representatives regarding case specific questions; and (g) will be responsible for calculating and mailing the Settlement Class checks to Settlement Class Members as well as completing any associated tax withholding and reporting to the State and Federal tax authorities.

4. CPT received the Court-approved text for the Notice Packet from Counsel on February 17, 2022. CPT prepared a draft of the Notice Packet in both English and Spanish for mailing to the class members. Attached hereto as Exhibit A is a true and correct copy of the Notice Packet.

5. On March 15, 2022, CPT received a data file from Counsel containing the Class List information for the purpose of mailing the Notice Packet to Class Members. The initial mailing list contained 1,992 Class Members.

1 6. On August 6, 2022, CPT caused a National Change of Address (NCOA) database
2 search to be performed in attempt to update the addresses on the class list and ensure it was as
3 accurate as possible. A search of this database provides updated addresses for any individual who
4 had moved in the previous four years and notified the U.S. Postal Service of their change of
5 address.

6 7. The Notice Packets were enclosed in an envelope with the Class Member's name
7 and known address printed on the envelope. On April 11, 2022, the Notice Packet was mailed via
8 U.S. first class mail to all 1,992 Class Members. The Notice Packet indicated a dispute deadline
9 date of May 26, 2022, to dispute their number of weeks. The Notice Packet also indicated a
10 deadline date of June 10, 2022, to object or request exclusion from the settlement.

11 8. As of the date of this declaration, 89 Notice Packets have been returned to our
12 office by the U.S. Postal Service, 6 of which were provided a new address by the Post Office. For
13 the remaining 83 Notice Packets, CPT performed a skip trace to locate a better address using
14 Accurint, one of the most comprehensive address databases available. It utilizes hundreds of
15 different databases supplied by credit reporting agencies, public records, and a variety of other
16 national databases.

17 9. As a result of skip trace effort or requests from Counsel or Class Members
18 themselves, a total 79 Notice Packets have been re-mailed to date. Additionally, 14 Notice Packets
19 were forwarded by the Post Office. As of the date of this declaration, a total of 13 Notice Packets
20 are deemed undeliverable.

21 10. As of the date of this declaration, CPT has not received any requests for exclusion,
22 or objection.

23 11. As of the date of this declaration, CPT received 3 disputes. The disputes were
24 evaluated by counsel, in which 2 of the three were deemed invalid because the class members
25 were disputing time in a non-qualifying position or salaried position, and the last was invalid
26 because the class member did not provide supporting documentation to validate the dispute.

12. As of the date of this declaration, CPT will report a total of 1,992 Participating Class Members, representing 100.00% of the Settlement Class.

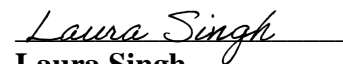
13. The entire Net Settlement Amount was used to calculate the estimated amount for each Class Member:

Total Settlement Amount	\$2,400,000.00
Less Class Counsel Fees	\$600,000.00
Less Class Counsel Costs	\$11,514.40
Less Class Representative Payment	\$7,500.00
Less LWDA Payment	\$18,000.00
Less PAGA Penalty Payment	\$6,000.00
<u>Less Settlement Administration Costs</u>	<u>\$19,300.00</u>
Net Settlement Amount	\$1,737,685.60

14. Based on estimated settlement calculations at this time, the average gross payment to each Class Member is \$872.33, the highest is \$4,938.27, and the minimum is \$17.27.

15. CPT will charge a total of \$19,300.00 in costs associated with the administration of the settlement. This includes all costs incurred to date, as well as estimated costs involved in completing the settlement.

I declare under penalty of perjury under the laws of the State of California and Washington and the laws of the United States that the foregoing is true and correct, and that this declaration is executed this 2nd day of September 2022, at Irvine, California.


Laura Singh